

AFFIDAVIT OF DEBRA JEZARD, RN

STATE OF MASSACHUSETTS)
) SS:
COUNTY OF PLYMOUTH)

1. I, Debra Jezard, make this affidavit of merit on behalf of The Estate of Kenneth J. Nolan. I am over twenty one (21) years of age and am fully competent and capable of making this affidavit.

2. I am currently licensed to practice nursing in Massachusetts, and I have 25 years of nursing experience, with a substantial focus in corrections. I have been a staff nurse, charge nurse, the Director of Clinical Services, providing medical services to several jails in Massachusetts. I am a Correctional Care Health Professional with the National Commission on Correctional Healthcare. In my professional work, I also mentor, engage and supervise the work of nurses and corrections officers who are engaged with booking and holding individuals who are arrested. More than 50% of my time has been engaged jail medicine.

3. I have reviewed the available records of Kenneth J. Nolan relative to his arrest, incarceration and initial medical interactions on November 20 and 21, 2019.

4. I am familiar with the applicable standard of care required of nurses and related corrections practitioners relative to these issues.

5. It is my opinion based upon my training, education, experience and background and review of the records available to the plaintiff, to a reasonable

degree of medical certainty (that is, more probable than not) that Nurse Ballard breached the standards of care, and having failed to establish safe procedures for taking individuals into custody and maintaining their medical safety.

6. Had proper medical screening and care been established and proper steps taken, Mr. Nolan more likely than not would have been transported to an emergency room for prompt treatment of an urgent medical condition.

7. This affidavit is made as a merit review and does not contain all the opinions or observations I have or may have regarding this matter. Furthermore, my opinions are subject to change based on additional information which may be provided.

Further affiant sayeth naught.


Debra Jezard, RN

Sworn to before me and subscribed in my presence this 26 day of November, 2021.


Notary Public



NOREEN CAHILL
Notary Public
Commonwealth of Massachusetts
My Commission Expires
February 17, 2023